



**AUDIT EXCEPTION POLICY FOR COVID-19**  
MARCH 2020 REVISED 17 MARCH, 30 MARCH AND 8 MAY 2020

**RAINFOREST  
ALLIANCE**



## SUMMARY

<b>Issue Date:</b>		<b>Binding date:</b>		<b>Expiration date:</b>	
March 7, 2020 Revised 17 March, 30 March and 8 May 2020		March 7, 2020 For Current revision 8 May 2020		December 31, 2020	
<b>Developed by:</b>			<b>Approved by:</b>		
<ul style="list-style-type: none"> <li>Rainforest Alliance</li> </ul>			<ul style="list-style-type: none"> <li>Director, Standards and Assurance</li> </ul>		
<b>Linked to (code and name of documents, if applicable):</b>					
UTZ related documents <ul style="list-style-type: none"> <li>UTZ Assurance Certification protocol, version 4.3 December 2018</li> <li>UTZ Code of Conduct for individual and multi-site certification, version 1.1 + relevant crop annexes</li> <li>UTZ Core Code of Conduct for group and multi-group certification, version 1.1 + relevant crop annexes</li> <li>Chain of Custody Standard + relevant crop annexes</li> </ul>			Rainforest Alliance related documents <ul style="list-style-type: none"> <li>RA Certification Rules, July 2017 version 1.2</li> <li>RA Chain of Custody Policy 2015</li> <li>Rainforest Alliance Sustainable Agriculture Standard, July 2017 version 1.2</li> </ul>		
<b>Reporting to RA</b>					
<p>CBs are required to request approval from Rainforest Alliance via <a href="mailto:certification@ra.org">certification@ra.org</a> before putting this policy in place for desk audits, remote audits and certificate/license extensions. RA reserves the right to review all extensions of certificate/license validity and volume allocation and remote audit decisions and respond accordingly. Please use the relevant COVID-19 template for these requests. The template can be found on the RA Website <a href="#">here</a></p>					
<b>Applicable to:</b>					
<p>Rainforest Alliance authorized Certification Bodies (CB) as well as Farm and Chain of Custody certified entities (for both UTZ and Rainforest Alliance programs). However, a number of country specific policies supersede the current policy and may implement different rules. Some sections of this policy are not applicable in certain countries – as indicated in the sections below.</p>					
<b>Regions:</b>					
<p>All regions subject to public health and mobility restrictions due to Covid19 according to information from the public health authorities for that country and where it is impossible to conduct onsite audits following the normal audit cycle. This policy may therefore be applicable in full in countries where there are still travel restrictions, and only partly in others where restrictions have eased. CBs making use of this policy must check updates of restrictions in force in the relevant country.</p>					
<b>Crops:</b>			<b>Type of organizations:</b>		
All			Farm and Chain of Custody entities		



## MAIN CHANGES FROM VERSION OF 30 MARCH 2020

The table below summarizes the main changes in this version of the policy from the previous version published on 30 March 2020

<b>Summary Table</b>		
<b>Pg</b>	<b>Clause</b>	<b>Change</b>
<b>General Conditions</b>		
1	Expiration date	Extended to 31 December 2020
1	Reporting to RA	Template introduced for requests to RA to apply this policy
1	Applicability	Specification that certain clauses of this COVID-19 policy do not apply in Cote d'Ivoire, Ghana and India (Assam). This is indicated in the related clauses of the policy.
1	Regions	Includes specification that the policy applies to parts of countries, as well as whole countries where travel and public health restrictions are in force in response to COVID19 and where it is impossible to conduct onsite audits following the normal audit cycle.
<b>Chain of Custody</b>		
2	2.2 c)	Dates updated in line with extension of validity of the COVID19 policy Clarification the policy also applies to RA surveillance/verification audits
5	2.2 d)	Includes definition of the term <i>new certificate holders</i>
5	2.2 e)	NEW clause clarifying rules for operators with expired or cancelled certificates
5	2.2 f)	Previously 2.2 e)
5	2.2 g)	Previously 2.2 f)
<b>UTZ Code of Conduct and RA SAS 2017 Farm Standard</b>		
5	2.3 b)	Dates updated in line with extension of validity of the COVID19 policy
6	2.3 d)	Additional conditions for members whose certificate was previously suspended or who received a non-certification decision
6	2.3 e)	NEW clause requiring extensions of scope or volume above 10% to be verified by remote or on-site audit
6	2.3 f)	Previously 2.3 e) Included definition of the term <i>new certificate holders</i>
6	2.3 g)	Previously 2.3 f) Date changes in line with the new expiration date Clarification the policy also applies to RA surveillance/verification audits
6	2.3 h)	Previously 2.3 g) Permits the use of remote audits conducted in conformity with <i>Rainforest Alliance Guidance on Remote Auditing published April 2020</i> .
6	2.3 i)	NEW clause setting out rules for remote auditing in Cote d'Ivoire and Ghana
7	2.3 j)	NEW clause indicating a separate policy for India (Assam) will be developed



7	2.3 k)	Previously 2.3 h) Permits fully remote audits for Short Harvest Window crops in conformity with the <i>Rainforest Alliance Guidance on conducting Remote Audits</i> .
7	2.3 l)	NEW Clause removing the obligation on CBs to conduct surprise audits during the validity of this policy.

## 1. INTRODUCTION

Rainforest Alliance is a growing network of people who are inspired and committed to working together to achieve our mission of conserving biodiversity and ensuring sustainable livelihoods. For more information about Rainforest Alliance, visit its website: <http://www.rainforest-alliance.org>.

## 2. POLICY FOR AUDIT EXCEPTIONS DUE TO COVID-19

### 2.1 JUSTIFICATION

Currently, due to restrictions on travel and access to certain sites due to public health risks related to COVID-19 (Coronavirus), cases are arising in some localities where it is not possible to follow the planned schedule of audits in the annual audit cycle. Rainforest Alliance considers this to be a situation of force majeure which affects the normal implementation of our certification program. For this reason a specific policy has been developed to govern exceptions arising from disruptions to audit activities due to corona virus or public health measures imposed by the authorities in the country of operation. This procedure is in effect as of 7<sup>th</sup> March 2020. This is a temporary measure which is currently valid only until 31 December 2020. Information on any further extension or modification of the policy will be communicated before the end of that period.

### 2.2 POLICY FOR CURRENT UTZ AND RA CHAIN OF CUSTODY STANDARDS

- a) All rules in the current certification document apply and continue to be mandatory (UTZ Assurance Certification protocol, version 4.3 December 2018 and RA Chain of Custody Policy).
- b) For existing certificate holders, where it is not possible for an Auditor to conduct an in-person audit, Rainforest Alliance authorizes CBs to carry out remote CoC audits of Participating Operators (CoC POs). These will replace the onsite audits required for the current audit cycle per the relevant certification documents.
- c) For existing certificate holders where a desk audit is also not possible, an extension of license/certificate is allowed up to 31 December 2020. Audits must be conducted before 31 October 2020 to allow for new certificates to be issued as soon as possible thereafter. This applies to all audits including RA surveillance and verification audits. Once the surveillance/verification audit has been completed the CB should indicate in Salesforce that



the delay was due to COVID-19. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana.**

- d) New certificate holders are those that either have never had UTZ or Rainforest Alliance certification or did not have a valid certificate/license as at 31 December 2019. New certificate holders who had already scheduled their audit before 30 March 2020 and have begun trading RA or UTZ volumes, must conduct a desk audit now, followed by an on-site audit when feasible. The desk audit does not eliminate the need for the on-site audit. This also applies to entities that were once audit exempted/endorsed and no longer fall into that category. The certificate and/or license will be issued as a result of the desk audit.
- e) For entities who had a valid certificate on or after January 1, 2020 and that certificate has been cancelled, a desk audit can be conducted to initiate a new certification cycle. This is not considered a new certification. Entities that did not have a valid certificate on or after December 31, 2019 are required to conduct an on-site audit to initiate a new certification cycle.
- f) No new certifications will be issued for chain of custody operations, who did not schedule an audit before 30 March 2020, without an on-site certification audit using the normal procedure.
- g) Rainforest Alliance reserves the right to insist on an on-site audit for companies as needed. In this case an extension of the existing licence may be granted to cover the period until an on-site audit can be conducted.

### **2.3 POLICY FOR CURRENT UTZ CODE OF CONDUCT AND RA SAS 2017 FARM STANDARD**

- a) All rules in the current certification document apply and continue to be mandatory (UTZ Assurance Certification protocol, version 4.3 December 2018 and RA Certification Rules, July 2017 version 1.2).
- b) Existing certificate holders with certificates expiring on or before 31 July 2020, may be granted a license extension for a period up to 31 December 2020 for an on-site audit to be conducted. Audits must be conducted before 31 October 2020 to allow for new certificates to be issued as soon as possible thereafter. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana or India (Assam).**
- c) Certificate validity extensions do not change the dates of the current audit cycle. This means that the next audit following the extension audit will take place according to the original schedule, even though less than 12 months have elapsed. For example, if this year's audit was to be carried out March 1st but was carried out on August 1st due to an exemption under the COVID19 policy, the regular March 1st audit schedule shall be maintained for the coming



year. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana or India (Assam).**

- d) License extensions may be granted for a maximum of 50% additional certified volume. The additional authorized volume of 50% will be based on the current approved volume and will be deducted from the total volume certified when the in-person audit takes place. The final authorized volume for the certificate will be verified during the on-site audit. The CB must indicate the total amount verified and approved in the report and certificate / license. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana or India (Assam).**
- e) Expansion of scope or volume beyond a maximum 10% volume extension and a maximum 10% growth in group members can only be granted following either a remote or an onsite audit. A CB can allow for more than 10% growth of group members, only if internal inspections have taken place on all additional new members and the CB is satisfied with the proof provided. CBs must inform RA of requested extensions of scope and volume using the template provided [here](#). **Group membership growth beyond 10% is not permitted in certificate holders in Cote d'Ivoire or Ghana or India (Assam).**
- f) New certificate holders are those that either have never had UTZ or Rainforest Alliance certification or did not have a valid certificate/license as at 31 December 2019. No certifications will be issued for new farm operations without an on-site certification audit using the normal procedure. Members who had a valid certificate on or after January 1, 2020 and that certificate has been cancelled, suspended, and/or received a non-certification decision, will need to receive an onsite audit using the normal procedure, if they wish to apply for recertification. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana or India (Assam).**
- g) All pending on-site audits must be conducted before 31 October to allow for new certificates to be issued as soon as possible. This applies to all audits including RA surveillance and verification audits. Once the surveillance/verification audit has been completed the CB should indicate in Salesforce that the delay was caused by COVID-19. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana or India (Assam).**
- h) Requests by CBs to carry out remote audits for existing farm level certification will be reviewed case by case. Remote audits must be carried out in conformity with the *Rainforest Alliance Guidance on conducting Remote Audits*.
- i) **For Certificate Holders in Cote D'Ivoire and Ghana** partial remote audits may be conducted where it is not possible for auditors to conduct onsite audits immediately. Partial remote audits must be carried out in conformity with the *Rainforest Alliance Guidance on conducting Remote Audits*. A certificate may be issued based on the remote part of the audit with a volume allocation determined by the risk level of the Certificate Holder. CBs will be informed of the risk level during the audit allocation process. The volume allocation may be adjusted



once the onsite audit has been performed. Onsite audits conducted as part of partial remote audits must be completed by 30 September 2020.

- j) **For Certificate Holders in India (Assam)** a separate policy will be developed and communicated separately to stakeholders.
- k) For Short-Harvest Window crops for which the harvest window falls within the validity of this policy, a fully remote audit is possible if the harvest season will finish within the validity of this policy. Fully remote audits must be carried out in conformity with the *Rainforest Alliance Guidance on conducting Remote Audits*. The auditor must assess compliance with the internal inspection carried out by the certified organization before making the certification decision. The CB has the right to charge for these services. The following audit in the audit cycle should be semi-announced or unannounced. **This clause is not applicable to certificate holders in Cote d'Ivoire or Ghana or India (Assam).**
- l) CBs are not obliged to conduct the proportion of surprise audits required under section 3.4 of the UTZ certification protocol during the validity of this policy. If you have any doubts about not being able to conduct surprise audits still this year, please inform us on [cbmanagement@ra.org](mailto:cbmanagement@ra.org).